



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

OFFICE OF
WATER

MEMORANDUM

TO: Water Division Directors
FROM: Victor J. Kimm, Director
Office of Drinking Water (WH-550)
SUBJECT: Plugging and Abandonment Plans

Purpose

Questions have been raised as to how the requirements for preparing and submitting plugging and abandonment ("P&A") plans are to be implemented. Specifically, it has been asked, is the "key well" approach appropriate under the P&A plan requirements in §144.28(c)?

Guidance

The Agency intended to convey in the May 11, 1984 preamble to the rules cited above that the "key well" approach would, under appropriate circumstances, be used for P&A plans. In that preamble, it was made clear that:

Even in cases where the owner or operator has hundreds of wells this [P&A plan requirement] is not a significant burden, since to the extent that the wells are similar, are in the same field, and penetrate to the same formation they will be plugged in the same manner and an operator need only submit a single plan covering such wells.

49 Fed. Reg. 20132, at 20146 (May 17, 1984).

The "key well" approach simply means that whenever the owner or operator shows that a group of wells are of sufficient similarity, penetrate the same formation, and will be plugged in the same way, it is only necessary for him or her to submit one P&A plan covering all of these wells. If the owner or operator shows that wells in different formations share these similarities of construction and geologic setting, and that the wells will be plugged in the same fashion, the "key well" approach also is appropriate for those wells.